

EXHIBIT D

Alter, Benjamin D.

From: Wolosky, Lee
Sent: Friday, April 22, 2022 1:34 PM
To: Maloney, Brian P.; Paulsen, Bruce
Cc: Mitchell, Douglass A.; Alter, Benjamin D.
Subject: Re: Suez Rajan

Brian,

It is unfortunate that you are now trying to walk back the representations and assurances you provided to us on the phone. Regardless, we note that you seem to have considerable knowledge and understandings regarding the operation of the vessel. These understandings belie your claim that your clients are not involved in the vessel's operations. In fact, we understand that your clients' "cooperation" with the U.S. government has involved discussions over the disposition of the vessel and its cargo, which is certainly inconsistent with your representations to us and the court concerning the contractual limitations around their role in the operation of the vessel.

We note in this regard that Respondents have to date produced only a single document in response to our discovery requests for multiple categories of documents, including one concerning Respondents' "communications . . . concerning the disposition of the Suez Rajan vessel or the cargo aboard it."

We would welcome your clients' reconsideration of their decision to refrain from meaningfully responding to our discovery requests, or for you to provide additional clarifications regarding these matters as you believe are warranted.

Lee

From: "Maloney, Brian P." <maloney@sewkis.com>
Date: Thursday, April 21, 2022 at 3:35 PM
To: "Wolosky, Lee" <LWolosky@Jenner.com>, "Paulsen, Bruce" <paulsen@sewkis.com>
Cc: "Mitchell, Douglass A." <DMitchell@jenner.com>, "Alter, Benjamin D." <BAlter@jenner.com>
Subject: RE: Suez Rajan

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Hi Lee,

We discussed on the March 9, 2022 call that the Vessel was then located in international waters near Singapore. We understand that remains the case today. And, as you know from our opposition to claimants' motion, the U.S. government has commenced an investigation concerning the cargo aboard the Vessel, and Respondents are cooperating with that investigation, which remains ongoing. That also remains the case today. The ongoing position of the vessel is in the public domain. As you are also aware, the Vessel is subject to a bareboat charter agreement, under which full possession and control of the Vessel is in the hands of Suez Rajan Limited, a third party that is neither owned, operated, managed, affiliated, nor otherwise controlled by any Respondent.

We respectfully disagree with your presentation of the substance of our March 9 call. We stated in that call that Respondents did not have control over the Vessel (which is in the hands of Suez Rajan), and that it was possible that the

Vessel could move, or that the cargo could be sold. However, we stated that it was our understanding (and remains so now), that the vessel "is not going anywhere" while the investigation is underway. That said, given that Respondents have no control over the position or movements of the vessel, those in control may indeed move the vessel again at some point in order to take on additional provisions or to account for any inclement weather that it may encounter, or for other purposes. We hope this clears up any confusion on this point that may exist.

By the way, the attachment below also does not show the vessel being docked at Singapore, it shows the vessel under way on the high seas away from Singapore. We understand that the vessel repositioned to call at outer port limits Singapore in order to take aboard supplies for the crew and the vessel. We understand that the vessel remains in international waters in the vicinity of Singapore.

Regards,
Brian

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Counsel

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From: Wolosky, Lee <LWolosky@Jenner.com>
Sent: Thursday, April 21, 2022 11:56 AM
To: Maloney, Brian P. <maloney@sewkis.com>; Paulsen, Bruce <paulsen@sewkis.com>
Cc: Mitchell, Douglass A. <DMitchell@jenner.com>; Alter, Benjamin D. <BAAlter@jenner.com>
Subject: [EXTERNAL] Suez Rajan

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Dear Bruce and Brian:

We write to follow up our discussions regarding the Suez Rajan. During Brian's telephone call with Ben Alter on March 9, 2022, Brian informed us of a U.S. government investigation concerning the Iran crude oil transferred to the vessel owned by your clients and represented that the "vessel is not going anywhere while the investigation is under way." Brian further said: "By way of assurances we just wanted to say that." Unless the U.S. government investigation has now concluded, Brian's representation now appears to have been inaccurate, since publicly available data indicates that the Suez Rajan has now docked in Singapore. See below.

We would appreciate your immediate explanation, including clarification as to whether the Suez Rajan is now unloading the Iranian crude oil cargo that is subject to pending legal proceedings in the SDNY.

